FOUR-FACTOR ANALYSIS TECHNICAL REPORT FOR LIMITED ENGLISH PROFICIENT (LEP) POPULATION IN MICHIGAN DEPARTMENT OF TRANSPORTATION PROGRAMS

June 28, 2011



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Introduction

On August 11, 2000, Congress passed the Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency". The Executive Order requires federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to federally funded programs and projects. This document explains MDOT's developed LEP four-factor analysis that outlines the procedures undertaken and consequentially the agency's compliance and adherence to the Executive Order 13166 directives.

Goal of the Four-Factor Analysis

- 1. To determine the number of LEP persons eligible to be served or likely to be encountered by MDOT projects and programs in the state Of Michigan.
- 2. To determine the frequency at which LEP individuals may come in contact-with MDOT projects and programs.
- 3. To emphasize the nature and importance of MDOT projects and programs or services to the lives of LEP population in their areas.
- 4. To inform and educate LEP population of the resources available to them through MDOT programs and projects.

Thus, four-factor analysis as analyzed here will be used by MDOT to guide project managers to making informed decisions in the following areas:

- Making informed decisions on how to strategically direct public involvement and participation toward the most needed and most affected Title VI or low-income and minority populations in the state.
- Making informed decisions on what, why, and how to order and distribute brochures to notify the public about MDOT projects and programs
- Making best decisions on how to notify the public of their Title VI rights and how proposed projects and programs may impact them.

Scope of the Analysis

The scope of this analysis shall be a county level analysis of the 83 counties of the state of Michigan. The analysis will establish a state baseline for the entire state from which inferences can be made.

Methodology

This analysis relies solely on the U.S. Census Bureau 2005-2009 American Community Survey (ACS) data.

- 1. Using the American FactFinder Web site, a county-level query, for "B16001...Language Spoken at Home by Ability to Speak English for the Population 5+ Yrs," was developed and downloaded.
 - a. With a selection for the associated records of population identified by the ACS as people living in such Michigan county with such records labeled by ACS as people that "<u>Speak English less than</u> "very well'" (see appendix A).
- 2. The query included the following columns of data generated from the ACS report.
 - a. The query pulled the total population of Michigan by county (for the entire 83 counties in Michigan)
 - <u>b.</u> The query was downloaded in excel format for further statistical rendering.
 - c. The query identified the following groups and categories of races as people considered to be speaking English at the status of "less than very well" (see appendix B is a spreadsheet with hiding columns showing people from different nations).
- 3. For the purpose of developing a statewide threshold, the record for each group's within each county was summed up for the total aggregate number of people living in each county under the status of "speaking English at less than very well".
- 4. The total population by counties also was determined by summing up the total number of people living in each county together, i.e. summing the population column together.
- 5. The state threshold is therefore determined by dividing the number of people "speaking English less than very well" with the total number of people living in the state of Michigan.
- 6. A true and fair spread of the population across the state by counties; relative to the state average, was determined by using the Location Quotient (LQ) statistical formula (see Defining Location Quotient).
- 7. The counties considered to have LQ values greater than one (LQ >1) shall be considered LEP-significant counties.
- 8. Due consideration shall be accorded to these LEP-significant counties when an MDOT Call for Projects (CFP) is issued and analyses are done.
- 9. During the annual CFP and the development of the Environmental Justice (EJ) analysis process, due consideration shall be giving to projects

considered to be EJ-significant that are located within LEP-significant counties.

- 10. CFP thematic map(s) shall be overlaid on the LEP area map for LEP analysis
- 11. Project managers shall be informed of the population groups to look out for during project development and outreach programs as well as project implementation phases in order that adequate provisions are made to accommodate the LEP-identified population(s).

Developing State LEP Baseline Ratio

Using the ACS 2005-2009 data at the county level, the MDOT LEP statistical analysis sums up all the record of populations groups identified in the query to get the total number of LEP populations living in such county. Since the total number of people living in each county is also downloaded, the following equation gives the ratio of LEP populations living in each **county in** the state of Michigan.

Table 1: Calculating County Level LEP Values

County LEP Average								
	Summation of all LEP persons in Kent County= 3107 Total Number of people in Kent County= 55589							
County LEP Total number of people in County speaking English less than "very well" Average = Total number of people in such county								
County LEP	P Average for Kent County = Average for Alcona County =	31078 555890 41 11002	0.055906744 0.003726595					

As illustrated in the table below, the State LEP Baseline ratio is developed by dividing the summation value at the county level by the total population of people in the state.

Table 2: Calculating State Level LEP Baseline Ratio

State Level LEP Baseline Ratio Summation of Total Number of LEP people in all Michigan counties= 320453 Total population in the state of Michigan (by ACS 2005-2009 data) = 9406371 Summation of total number of LEP in all Michigan counties State Baseline Ratio = Total population in the state of Michigan State Baseline Ratio = 9406371 0.034067655 3.4% For every 3.4% of state of Michigan's resident sampled in ACS survey, one of them is "speaking English less than very well"

- By the ACS 2005-2009 data, there are approximately 320,453 people living in Michigan considered to be "speaking English less than very well."
- This number represents about 3.4 percent of the population of the state Of Michigan.
- Should any MDOT public outreach involve at least 3.4 percent of the LEP population residents in such county (with representation from groups identified as LEP), the agency would have appropriately met the population threshold requirement.
- For every 3.4 percent of residents in county's considered LEP-significant, adequately involving at least 3.4percent of residents would have been a satisfactory benchmark for public outreach for MDOT programs and plan implementation.
- Outreach for at least 3.4 percent of such population will be considered significant to conforming to Executive Order 13166.

Defining Location Quotient

Location quotient (LQ) is a statistical technique used in calculating and comparing the share contribution of an areas local economy to another referenced economy. The LQ method also can be defined as a statistical method that strives to show if a local economy has a greater share than expected of a given economy. Using the average of the local economy against the average of the larger economy, the LQ method marks that extra contribution of such local economy as the additional contribution that such local economy is contributing. In this scenario, the LQ method is used to determine whether or not a particular county has a greater share of its LEP populations than expected in the state.

Hence, that local economy having a greater than one (LQ>1) contribution will be recognized as an LEP-significant county in the state.

The statistical notation for the LQ:

$$LQ_i = \frac{\frac{x_i}{n_i}}{\frac{x}{n}} = \frac{x_i}{x} \times \frac{n}{n_i}.$$
 (1)

Using Location Quotient to Determine LEP Significant Counties

The LQ as used in this analysis (and exemplified in the following illustrative examples) helps to determine the true value of the location of LEP populations as related to the total population of the counties.

Table 3: Examples of Location Quotient Calculation for Counties

Examples of Location Quotient Calculation for Counties									
Xi	Summation of all LEP-identified groups of population by ACS data								
ni	Total popul	Total population in the county							
X	Total numb	Total number of LEP population in the state of Michigan							
n	Total Number of population in the state of Michigan								
	Total pop.	LEP pop. in	Total pop. in	Total LEP pop.					
Counties	(n i)	county (X i)	state (n)	in state (X)	LEPT LQ				
Kent County	555890	31078	9406371	320453	1.64				
Oceana County	25792	1336	9406371	320453	1.52				
Wayne County	1843082	94842	9406371	320453	1.51				
Barry County	55281	323	9406371	320453	0.17				
Shiawassee County	67117	383	9406371	320453	0.17				
Ontonagon County	6677	37	9406371	320453	0.16				
Source: U.S Census Bureau, ACS 2005-2009									

The resulting values of the calculations made above are interpreted in the following statistical ways:

LQ < 1.0: Such counties having LEP populations considered insignificant enough to be designated as LEP-significant counties (see LEP LQ numbers for Barry, Shiawassee and Ontonagon counties in the examples above). This

implies that such counties having values less than one have insufficient Title VI population considered "Speaking English less than "very well".

LQ = 1.0: Such block groups have populations that are just sufficient enough to be considered as LEP-significant counties.

LQ > 1.0: Such counties with LEP LQ greater than one provides evidence that these counties have concentrations of racial populations that are greater than what other counties have in their county boundaries (see LEP LQ numbers for Kent, Oceana, and Wayne counties in the examples above). These counties are considered LEP-significant counties and would represent the selection set considered being LEP-significant areas in the thematic map analysis.

In light of the calculations above and the statistical findings, it is safe to conclude that:

- 1. For every 3.4 percent of the time, it is strongly likely to encounter Title VI populations with LEP status of "speaking English at less than very well" in the 10 counties identified on appendix C as having LEP LQ >1.
- 2. If projects identified as EJ-significant projects exist in the identified 10 counties, it is strongly likely that projects of EJ significance may have appreciable impact(s) on LEP populations in the identified 10 counties than in others having LEP LQ<1.
- 3. It is therefore highly recommended that program managers in the 10 counties pay particular attention to methods of engaging and involving LEP populations in such counties.

The following checklists of questions, though not exhaustive, are provided as a guide to program managers and project implementation officers to help identify what could likely be a project of LEP significance.

Developing LEP Thematic Map in TransCad Program

The ACS data shall be saved as a database file and imported into the TransCad geographic system <u>information</u> program for mapping and analytical purposes. Using the LEP LQ column of the database, a thematic map shall be generated to show three levels of LEP populations in Michigan.

- 1. LEP areas of High Significance
- 2. LEP areas of Medium Significance
- 3. LEP areas of Low significance

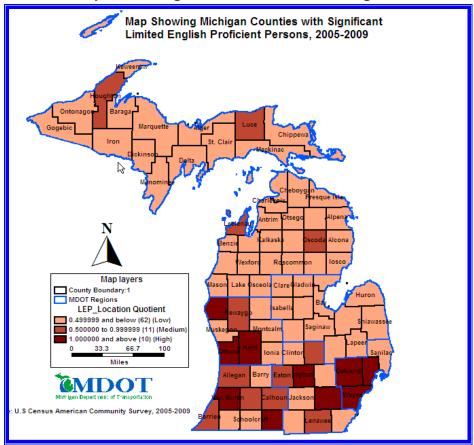
The LEP thematic map shall work closely with the EJ evaluation analysis map on MDOT annual CFP analysis that specifically screens projects as to whether they are "Categorical Exclusion" projects or "EJ-significant" projects.

Categorical Exclusion (CE) projects are defined as projects that do not individually or cumulatively have significant effect on the human environment ... and ... for which, therefore, neither an environmental assessment nor an environmental impact statement is required. Primary work type definition of such projects include road resurfacing, restore and rehabilitate, bridge or deck replacement, capital preventive maintenance, traffic operations/safety and such other projects covered under the FHWA certified CE checklist of projects.

EJ-significant projects are defined as projects that may individually or cumulatively have significant effects on the human health or social environment and for which environmental assessment and/or environmental impact statements are required. Primary work type definition of such project includes new road or new route capacity improvements, minor and major capacity improvements and such projects that may include property condemnation or acquisitions and/or takings, or major right of way acquisition.

If projects considered as EJ-significance exist within an LEP-significant county, the information shall reflect on the map overlay and be subsequently shared with the MDOT Equal Employment Opportunity Officer (EEO), Civil Rights Programs Unit to ensure that adequate attention, procedures and resources are deployed to mitigate and adequately address any adverse or consequential impact that cumulates to conforming with and adhering to all existing federal and state regulations.

Thematic Map of LEP Significant Counties in Michigan



Analyzing MDOT FY 2012-2016 CFPs for LEP and Title VI Significance

Evaluating for EJ and LEP populations are two mutually related endeavors with both <u>analyses</u> looking at similar population data/cohorts to provide information on how to best involve and mitigate minority, low-income and Title VI population concerns. In the next update to the annual MDOT EJ CFP analysis, the LEP report will be incorporated as a mutual part of the full MDOT EJ CFP report because both analyses are mutually reinforcing and strengthening. Hence, this part of the analysis shall focus on one specific analytical finding(s) titled EJ-significant projects, as identified in the MDOT annual EJ CFP analysis. The emphasis will be to use this finding(s) to draw reasonable conclusions and inferences on the likely impact of MDOT projects and programs on LEP populations in Michigan.

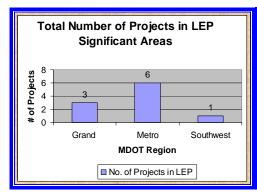
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What are EJ-Significant Projects?

EJ-significant projects consist of projects that may individually or cumulatively have significant effects on the human health or social environment, and for which environmental assessment and/or environmental impact statements are required. The primary work-type definition of such projects includes new road or new route capacity improvements, minor and major capacity improvements, and such projects that may include property condemnation or acquisitions and/or takings, or the acquisition of major right of way. As reported in the technical report of the MDOT FY 2012 - 2016 EJ analysis and by the defining standard stated above, the following list of projects (see Appendix C) were identified as EJ-significant projects in the LEP-significant counties. The inserted highlights show projects located in Michigan counties having LEP LQ >1 and considered as EJ-significant counties (see Appendix B, column labeled LEP_LQ).

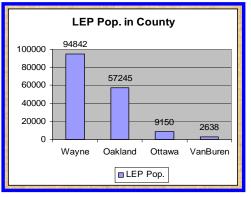
According to the table and as stated in the charts (1, 2 & 3) below, three projects in the Grand Region (two on M-104 and one on US-31) are located in Ottawa County. The estimated cost of these three projects is estimated at about \$22.3 million. These projects are expected to bring economic benefits and developmental impact to the Grand Region and it's expected to impact about 9,150 LEP populations in the county.

Charts 1, 2 & 3 LEP Significant Projects Statistics





Six projects located in Oakland and Wayne counties in the Metro region are estimated at a cost of about \$143.6 million and are expected to trickle down infrastructure and economic improvement benefits into the region. According to ACS 2005-2009 census data, approximately 152,087 LEP candidates reside in these two counties.



The impact of the various utility relocation and right-of-way phases of the New International Trade Crossing (NITC) project, a collaboration project with the country of Canada, are identified to be significant projects by the adopted definition. Though the total cost of construction is yet to be known, the NITC project will mark the beginning of a major project that should be closely monitored for adequate adherence to Title VI requirement and conformity to the needs of LEP population. The construction phase of the NITC project, which is still in the outer years of the planning cycle, also needs to be closely monitored. information the NITC project can Further on be http://partnershipborderstudy.com/ . One project in the Southwest Region on M-40 in Van Buren County, a minor widening project for add turn lane, is estimated at about \$0.67 million. This project is expected to have little or no significant impact on the 2,638 LEP or Title VI populations identified to be residents in the county.

Recommendation and Conclusion

This report and the information therein are considered as public information, and should be shared and distributed appropriately, with:

- MDOT officers involved in project design, project development, and project implementation and such groups or citizen groups to whom this information can benefit.
- MDOT personnel's coordinating public outreach and involvement should disseminate information on how MDOT projects and programs or services will benefit the lives of LEP population in their areas.
- The information shared should be tailored towards educating the public on how and where MDOT LEP resources are located and how to access them.
- Information about these projects and their geographic location have been shared with MDOT EEO, Civil Rights Programs Unit for further monitoring and coordination of services that will considerably improve the participation and involvement opportunities of all Title VI populations and

LEP groups in the state Of

Michigan.

In conclusion, as set out in the four goals of the report, the Title VI group identified as people "speaking English at less than very well" are spread out in every county of Michigan. However, the pattern of spread is uniquely following the hypothesis that the larger the population, the greater the number of people residing there that can be

Table 5: LEP Significant Counties					
County	LEP_LQ				
Kent County	1.641050565				
Oceana County	1.520474708				
Wayne County	1.510475927				
Macomb County	1.49851594				
Oakland County	1.486957073				
Ingham County	1.313349012				
Washtenaw County	1.253273753				
Ottawa County	1.116352333				
Van Buren County	1.065529409				
Branch County	1.007149414				

classified as speaking English less than very well. The methodology employed in this study points to the following facts:

- About 80 percent of the time, counties identified as having significant LEP populations are such counties located in the urbanized area of the state.
- 100 percent of the counties identified are located in the central and southern half of the state with the largest population concentration.

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- 3. For every project implemented within LEP significant county(s), it is strongly likely that an upper limit of 5.6 percent and a lower limit of 3.4 percent LEP persons could be encountered.
- 4. Directing strategic planning effort and well-coordinated outreach program in these identified counties will produce greater result and public recognition of MDOT programs across the state.

LEP Outcome Performance Measures and Data Gathering

On a two-year cycle basis, and based on the four goals identified by Executive Order 13166 above, the following performance measures shall be considered for feature evaluation of the implementation outcome of LEP outreach effort on MDOT programs and projects:.

- 1. MDOT region staffs shall document and share all records of public outreach provided to LEP populations in their areas. Such records shall include the type of public outreach employed (e.g. mailing, brochures, emails, Web site, churches or social gatherings used to circulate awareness; the number and locations of such meeting venues; meeting attendance worksheets that strive to collect data on LEP populations in attendance. The questionnaire for collecting such data can be requested from the MDOT office of EEO, Civil Rights Program Unit.
- 2. The TranScad Geographic Information Systems shall be used to determine the LEP-eligible persons encountered by MDOT projects and programs based on most recent U.S. Census data.
- A statistical formula shall be used to determine the frequency at which LEP persons are encountered during the implementation of MDOT projects and programs.
- <u>4.</u> The bi-annual report shall be made available on MDOT Web site for public viewing and accessibility.

APPENDIX A

П	ACS Identified Population with LEP Status									
1	Spanish or Spanish Creole	21	Other Indo-European languages							
2	French (incl. Patois, Cajun)	22	Chinese							
3	French Creole	23	Japanese							
4	Italian	24	Korean							
5	Portuguese or Portuguese Creole	25	Mon-Khmer, Cambodian							
6	German	26	Hmong							
7	Yiddish	27	Thai							
8	Other West Germanic languages	28	Laotian							
9	Scandinavian languages	29	Vietnamese							
10	Greek	30	Other Asian languages							
11	Russian	31	Tagalog							
12	Polish	32	Other Pacific Island languages							
13	Serbo-Croatian	33	Navajo							
14	Other Slavic languages	34	Other Native North American languages							
15	Armenian	35	Hungarian							
16	Persian	36	Arabic							
17	Gujarati	37	Hebrew							
18	Hindi	38	African languages							
19	Urdu	39	Other and unspecified languages							
20	Other Indic languages									
Soul	Source: U.S. Census Bureau American Community Survey, 2005-2009									

APPENDIX B

GEO_NA	B16001_1	B16001_5	B16001_8	B16001_1	B16001_1			
ME	_EST	_EST	_EST	1_EST	4_EST			
Geography	Total:	Spanish or Spanish Creole	French (incl. Patois, Cajun):	French Creole	Italian:	Total < LEP Pop.	LEP_LQ	Outreach Estimate
Kent County	555890	21828	174	8	118	31078	1.641050565	5.6%
Oceana County	25792	1195	7	0	0	1336	1.520474708	5.2%
Wayne County	1843082	35265	1544	12	1345	94842	1.510475927	5.1%
Macomb County	778458	3983	519	17	3210	39741	1.49851594	5.1%
Oakland County	1130048	11371	1130	14	903	57245	1.486957073	5.1%
Ingham County	261428	3269	147	151	86	11697	1.313349012	4.5%
Washtenaw County	325463	2825	863	10	103	13896	1.253273753	4.3%
Ottawa County	240590	5967	76	0	57	9150	1.116352333	3.8%
Van Buren County	72672	2354	20	0	41	2638	1.065529409	3.6%
Branch County	43018	752	32	0	28	1476	1.007149414	3.4%
St. Joseph County	57551	1423	4	0	0	1919	0.978768227	3.3%
Leelanau County	20915	451	21	0	9	579	0.812603067	2.8%
Berrien County	149607	2300	102	0	57	4136	0.81149599	2.8%
Newaygo County	45882	796	15	3	0	1178	0.753634397	2.6%
Allegan County	105181	2254	54	0	0	2647	0.738710731	2.5%
Oscoda County	8518	7	0	0	0	204	0.702991856	2.4%
Calhoun County	127677	1391	13	0	11	2894	0.665339978	2.3%
Houghton County	33261	92	10	0	11	724	0.638941396	2.2%
Lenawee County	94663	1655	56	0	0	2051	0.635979561	2.2%
Luce County	6354	87	3	0	0	133	0.614415542	2.1%
Kalamazoo County	229614	1987	223	0	0	4190	0.535640517	1.8%
Eaton County	100928	673	34	14	0	1743	0.506924734	1.7%
Lapeer County	86379	1068	23	0	14	1424	0.483904409	1.6%
Isabella County	63145	437	12	0	6	1034	0.480661496	1.6%
Muskegon County	162513	1851	46	0	0	2473	0.446677186	1.5%
Mackinac County	10364	52	19	0	0	155	0.438997509	1.5%
Cass County	47762	432	12	0	0	699	0.429588289	1.5%
Clinton County	65328	521	43	0	0	943	0.423711345	1.4%
Saginaw County	190174	1387	74	0	7	2628	0.405631788	1.4%
Montcalm County	58675	335	33	0	3	810	0.40521889	1.4%
Alger County	9079	20	3	0	15	120	0.387972544	1.3%
losco County	25180	133	16	0	4	324	0.377700054	1.3%
Genesee County	403219	1412	278	9	19	5113	0.372213882	1.3%
Menominee County	23085	40	22	0	5	290	0.36874478	1.3%
Livingston County	171690	804	129	0	36	2109	0.360569794	1.2%

APPENDIX C

					·		Construct center-turn lane			
							on M-29 and Michigan			
					at Michigan Road, city of		CMAQ Grant Number			
2012	ST. CLAIR	Metro	MDOT	M-29	Marysville	Widen - minor	#11048	\$ 500,0	00 112485	
							Development of the P3			American Indian,
					at I-75 Interchange, Plaza	New route/structure (capacity	proposal for			Black, Hispanics,
2012	WAYNE	Metro	MDOT	NITC	and Bridge	increase)	concessionaire	\$ 14,000,0	0 113693	Low-income
										American Indian.
						New route/structure (capacity	ROW and utility relocation			Black, Hispanics,
2012	WAYNE	Metro	MDOT	NITC	at NITC Plaza	increase)	design	\$ 3,000.0	00 113716	Low-income
						,		,,.		American Indian,
						New route/structure (capacity	ROW and utility relocation			Black, Hispanics.
2012	WAYNE	Metro	MDOT	NITC	at NITC Plaza	increase)	design	\$ 16,000.0	00 113716	Low-income
										American Indian,
					at the NITC / I-75	New route/structure (capacity	PF and utility relocation			Black, Hispanics,
2012	WAYNE	Metro	MDOT	NITC	Interchange	increase)	design work at I-75	\$ 17,000,0	00 112717	Low-income
2012	WATEL	IVIEUO	WIDO!	IVIIC	interendinge	intercuse)	design work at 170	\$ 17,000,0	113/1/	American Indian.
					at the NITC / I-75	New route/structure (capacity	PE and utility relocation			Black, Hispanics.
2012	WAYNE	Metro	MDOT	NITC	Interchange	increase)	design work at I-75	s	440747	Low-income
2012	WATINE	Metro	MDOT	NIIC	interchange	increase)	design work at 1-75	D.	- 113/1/	American Indian,
						New route/structure (capacity				Hispanics.
0040	ST. CLAIR		MDOT	A 05/0:	M-25/Pine Grove Avenue	increase)	Relocation of M-25	\$ 30,800,0	400007	Low,income
2013	ST. CLAIR	Metro	IVIDOT	M-25/Pine	North Perimeter Road	Increase)	Relocation of W-23	\$ 30,800,0	106607	Low,income
					Interchange to north of M-	Widen - major (capacity	Reconstruct interchange			American Indian
					interchange to north of M-					
2015	OAKLAND	Metro	MDOT	I-75		increase)	and CD roadways	\$ 93,618,8	31673	Asian Hispanics
					I-75 BL from Husted to	Widen - major (capacity		l		
2012	OGEMAW	North	MDOT	M-55/I-75	Gray Road	increase)	Add center left-turn lane	\$ 1,461,7	5 109229	Asian, Low-income
						Widen - major (capacity	Widening for center left-	l .		American Indian
2013	EMMET	North	MDOT	US-31	Townsend to Eppler	increase)	turn lane FY 2015	\$ 20,0	00 113598	Low Income
						Widen - major (capacity	Widening for center left-			American Indian,
	EMMET	North	MDOT	US-31	Townsend to Eppler	increase)	turn lane FY 2015	\$ 3,501,9		Low-income
	BERRIEN	Southwest	MDOT	US-12	1.5 miles east of I-94	Widen - minor	Left-turn lane	\$ 228,8		
2012	CASS	Southwest	MDOT	US-12	Gumwood Road	Widen - minor	Left-turn lane	\$ 743,0	00 106876	
	ĺ		L	1			Design and Construction	1	1	American Indian,
2012	ST. JOSEPH	Southwest	MDOT	US-131	St. Joseph County	increase)	of PA-5	\$ 23,829,9	99 46269	Low-income
	ĺ			1	Nottawa Street to Shimmel	l	1	1	1	American Indian,
2013	ST. JOSEPH	Southwest	MDOT	M-86	Road	Widen - minor	Revise lane configuration	\$ 468,7	110521	Low-income
					M-40 at 64th Avenue and					
2013	VAN BUREN	Southwest	MDOT	M-40	31st Street	Widen - minor	Added left-turn lane	\$ 655,8	106875	Hispanics
						New route/structure (capacity				
2012	HOUGHTON	Superior	MDOT	M-26	M-26, Houghton County	increase)	Re-align existing curve	\$ 729,3	110596	Low-income
						New route/structure (capacity				American Indian,
2014	LUCE	Superior	MDOT	M-28	Adjacent to Luce Co Airport		Construct new PITWS	\$ 102,0	110632	Low-income
						New route/structure (capacity				
2016	CHIPPEWA	Superior	MDOT	M-28	west of I-75 at Dafter TST	increase)	Construct new PITWS	\$ 99,6	110631	American Indian
						New route/structure (capacity				
2012	LIVINGSTON	University	MDOT	1-96	Latson Road interchange	increase)	Nonmotorized path	\$ 2,000.0	00 113283	American Indian
	MDOT CER To					· · · · · · · · · · · · · · · · · · ·		,,-		